

Meeting Minutes Transmittal

**T Plant Complex, Low Level Burial Grounds,
Central Waste Complex, Waste Receiving and Processing
Project Managers Meeting
825 Jadwin/Room 554
Richland, Washington
June 23, 2011**

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Project Managers Meeting. Signatures denote concurrence with the content only and are not intended to imply agreement to any commitments.


Project Manager Representative, Ecology

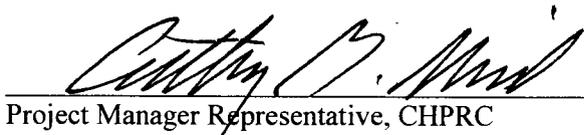
Date: _____

2/6/12


Project Manager Representative, RL

Date: _____

3 Jan 2012

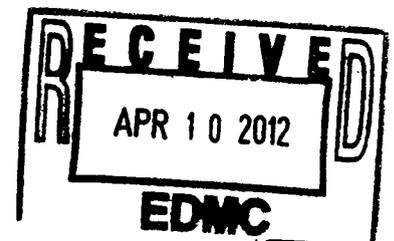

Project Manager Representative, CHPRC

Date: _____

2/1/12

Central Waste Complex Admin Record
LLBG Administrative Record
T Plant Complex Admin Record
Waste Receiving and Processing Admin Record
MS Collins
DL Flyckt
PT Karschnia
DG Singleton
LC Tuott
NW Ware

H6-08
H6-08
H6-08
H6-08
A6-38
T4-10
T3-28
H0-57
T4-52
T4-04



T Plant/LLBG/CWC/WRAP
PROJECT MEETING MINUTES
Project Managers Meeting
825 Jadwin/Room 554/700 Area
Richland, Washington

June 23, 2011

- I. Approval of May 26, 2011 T Plant Complex, LLBG, CWC and WRAP Project Meeting Minutes (Ecology/DOE-RL/CHPRC).
 - A. The PMM minutes were approved.

- II. Operational Status
 - A. Paul Martin (CHPRC) provided the operational status, including color slides depicting waste retrieval activities (see attached charts and tables). Deborah Singleton (Ecology) asked where the 40 drums are being stored that are under a Land Disposal Restriction (LDR) request. Mike Collins (RL) responded that they are being stored at CWC.

- III. Status of Previous Agreements and Commitments
 - A. There were no previous agreements and commitments to status.

- IV. New Agreements and Commitments
 - A. There were no new agreements or commitments established.

- V. Near Term Schedules and Ongoing Activities
 - A. TSD Units Permit Status
Ms. Singleton stated that the only unit permit that currently would be on Ecology's Share Point is LLBG trench 94. Tony Miskho (CHPRC) noted that CHPRC files indicate that there are no unit permits on Share Point. Ms. Singleton indicated she would check to see if the files are on Share Point and send an email to RL/CHPRC regarding the status. Ms. Singleton stated that there are no significant issues with trench 94. Ecology is ensuring that language is included for groundwater and will be using the geophysical study that the CHPRC groundwater team will be doing to determine possible locations for groundwater monitoring wells. Ms. Singleton noted she removed references in the waste analysis plan (WAP) about waste transfers to a SWOC unit, since that activity did not take place, and removed most references to physical and chemical screening. Ms. Singleton added that information from the liner variance was incorporated into the WAP, and the liner variance will be an attachment to the trench 94 permit. Mr. Collins noted that when all of the sections of the trench 94 permit are received, it will be sent to the Navy for review.

Ms. Singleton stated that the CWC, WRAP, T Plant and LLBG trenches 31/34 draft permits are being reviewed by the Attorney General (AG), and the AG has requested a brief summary of the operational activities of the units. Following the AG's review and

receipt of the summary of operational activities, internal meetings will be held to discuss any major potential issues that could impact the operations of a facility and any legal questions the permit writers may have.

Ms. Singleton stated that she has addressed the bigger issues and any legal questions associated with trenches 31/34. The two issues for 31/34 are in-trench treatment and the language regarding the Land Withdrawal Act (LWA). Ms. Singleton stated that there was a brief statement about liquids not needing to meet the Land Disposal Restriction (LDR) requirements for liquids because of the LWA, and the AG is going to revise the language to talk about certification in lieu of. Mr. Miskho stated that the reference should be transuranic waste and not liquid, according to section 7.3 of the WAP. Ms. Singleton responded that the AG did use the term liquid, and there are two sections in the WAP that refer to liquid. Ms. Singleton noted that the AG is conferring with the EPA attorney on the in-trench treatment because it may become an issue between RL and EPA since it is currently identified as an acceptable approach within other RCRA facilities or units.

Ms. Singleton stated that for the SWOC unit permits, the intent is to release the LLBG green islands unit permit first on Share Point after the AG completes a final review. Ms. Singleton renewed her invitation for RL/CHPRC to come to the Ecology office and review the files with her. Ms. Singleton expressed concern regarding CWC and some of its permit conditions, and encouraged RL/CHPRC to set up a time to review the files at Ecology's office. Ms. Singleton stated her intent to develop permit conditions to address RL/CHPRC's need to store the large boxes, noting that some permit writers within Ecology have concerns regarding secondary containment for those boxes. Ms. Singleton added that the EPA permit writer has expressed concern regarding keeping incompatible waste separated. Mr. Miskho noted that he is in the process of obtaining information referenced in the Idaho permit regarding compatibility of waste, and the information may be useful to Ecology. Mr. Collins agreed to schedule a meeting at Ecology's office next week to review the files and address specific items. Ms. Singleton responded that she has compiled a list of specific items for review, such as the big boxes.

B. LLBG Groundwater Sampling

Mr. Miskho provided an update on groundwater sampling. Sampling is scheduled for Waste Management Area 1 (WMA-1) in July 2011. Samples were collected in April in WMA-2, except for well 299-E27-9, due to TRU retrieval in trench 17, and E27-9 was sampled in May. In WMA-3, samples were collected in April, except for well 299-W7-4, which was sampled in May. The next sampling in WMA-3 is scheduled for September. Sampling in WMA-4 is scheduled for July.

VI. Approved Changes Signed off in Accordance with TPA Section 12.2

A. There were no approved changes signed.

VII. General Discussion

A. T Plant Tank Inspection Frequency

Ms. Singleton stated that the Ecology person assigned to review the request to reduce the tank inspections has indicated that the frequency should not be reduced. Ms. Singleton will forward the reasoning for the recommendation to Mr. Collins.

B. Mr. Miskho stated that there are four to five containers that are currently within the green islands that RL/CHPRC want to redesignate as nondangerous waste. Mr. Miskho stated that the comments that were provided on the green islands are consistent with taking off some of the trenches. Previously when the trenches were taken off and certified, a burial ground record package was sent to the Administrative Record (AR) that provided a basis for the green islands. Mr. Miskho proposed taking an action to put together a similar package that provides the reasons for redesignating the containers and sending it to the Administrative Record. Ms. Singleton responded that the onus is on RL/CHPRC to explain to the public interest groups as well as the tribal nations what the reasoning is for redefining the green islands and identifying them as no longer being green islands. Mr. Miskho stated that there are two categories for redefining the green islands. One category is that shielding was used when the waste was disposed, and the policy has changed on the regulatory status of shielding. The second category is associated with the disposal of the B Plant HEPA filters in 1993, which are categorized as a regulated carcinogen, dioctyl phthalate (DOP). The HEPA filters were flood-grouted when they were disposed, and RL/CHPRC believe it is appropriate to take into account the flood-grouting weight in the overall waste designation. If the weight were taken into account, it would put the disposal package below the DOP toxicity level of concern. Mr. Collins acknowledged that the case will have to be made for redesignation from green islands to nondangerous waste.

C. Mr. Miskho initiated a discussion regarding Ecology's requests for additional information for permit renewal. Mr. Miskho stated that the T Plant treatment information has been prepared and sent through the system, but the CWC and WRAP treatment information is on hold. Following a brief discussion, Mr. Collins requested that CHPRC proceed with gathering the CWC/WRAP treatment information to send to Ecology. Ms. Singleton requested that the information requests be reviewed during a scheduled meeting to ensure it is being used for permit renewal, and if it is not, then she indicated CHPRC should not expend the time to gather the information.

VIII. Actions

Unit	Description of Action	Status	Date
LLBG	RL/CHPRC will provide Ecology with an information package on unused areas of burial grounds	Pending	4/23/09
		The information was provided to Ecology, and Ecology has provided comments. CHPRC is dispositioning Ecology's comments	12/9/10
		No status provided	1/27/11
		RL is investigating two	2/24/11

		anomalies in the field. Permittees will provide an updated report after anomalies are addressed.	
		Investigation of two anomalies continues	4/28/11
		Doug Hildebrand (RL) will provide the status at the next PMM for the two anomalies; i.e., to be designated as non-TSD past practice WIDS sites	5/26/11
		RL provided a status that the anomalies will be incorporated as a Waste Identification Data System (WIDS) site. Currently in Ecology review	6/23/11
LLBG	Ecology to determine what form the groundwater monitoring plan will take, and whether a compliance schedule will be established for the regulatory approach to the burial grounds	Action established	1/28/10
		No change in status. Waiting for results from DQO process.	10/28/10
		A meeting is scheduled for January 2011 to discuss WMA-1	12/9/10
		No status provided	1/27/11
		The groundwater monitoring plan for trenches 31/34 is in MSA for reformatting. A compliance schedule for trench 94 will require a date for submitting the groundwater monitoring plan	2/24/11
		The groundwater monitoring plan for trenches 31/34 is in Ecology review. A permit condition for the ZP-1 pump and treat system has been submitted to Ecology; impacts from the pump and treat on 31/34 will need to be evaluated. The status for trench 94 remains the same. The Part A agreement will impact how the used areas	4/28/11

		are addressed.	
		Ecology will review the permit conditions for 31/34. It was agreed that the ZP-1 pump and treat aspect is not a permit condition but is a schedule for determining the well network based on the impacts from ZP-1. An interim status groundwater monitoring plan will be incorporated into the Part A for trench 94, pending a compliance schedule for the final status plan. There will be a permit condition for conducting a geophysical exploration in trench 94. The four interim status groundwater monitoring plans will be incorporated into the Part A for the green islands (closure unit 26).	5/26/11
		It was agreed that the action has been completed. The groundwater monitoring plan has been completed. A compliance schedule will be established for trench 94, and the current groundwater monitoring plan in the waste management areas will be used for the used areas. This action was closed.	6/23/11

IX. Documents for Submittal to the Administrative Record.

A. 11-EMD-0055, dated May 13, 2011, the RL letter notifying Ecology that inspections were stopped at WRAP was identified. RL letter No. 11-EMD-0064, dated June 8, 2011, notifying Ecology of the restart of inspections at WRAP was identified (Accession #0093854, EDMC# 0097108).

X. Next Project Mangers Meeting

A. The next PMM was tentatively scheduled for July 28, 2011.